



BRUCE R. EWING
(212) 415-9206
ewing.bruce@dorsey.com

October 28, 2016

VIA ECF

Honorable Anne Y. Shields
United States Magistrate Judge
Eastern District of New York
100 Federal Plaza
P.O. Box 830
Central Islip, New York 11722
Courtroom 830

Re: *Canon U.S.A., Inc. v. F & E Trading LLC et al.*
Case No. 2:15-cv-6015-DRH-AYS

Dear Magistrate Judge Shields:

We represent plaintiff Canon U.S.A., Inc. (“Canon USA”) in the above-referenced action (the “Action”). We write jointly with counsel for all defendants to request an adjournment of the deadlines set forth in the operative Discovery Plan Worksheet.

There has been one (1) prior request for adjournment. Specifically, on June 3, 2016, the parties jointly requested an extension of discovery deadlines in light of Canon USA’s filing of a Second Amended Complaint naming new defendants. *See* ECF No. 53. The parties’ request was granted on June 5, 2016.



Hon. Anne Y. Shields
October 28, 2016
Page 2

The current deadlines and agreed-upon proposed deadlines are as follows:

Event	Current Deadline	Proposed Deadline
All fact discovery completed	November 1, 2016	March 1, 2017
Exchange of expert reports	December 1, 2016	April 3, 2017
Expert depositions completed	January 5, 2017	May 12, 2017
Completion of all discovery	January 17, 2017	May 26, 2017
Final date to take first step in dispositive motion practice	February 7, 2017	June 14, 2017
Submission of joint pre-trial order	April 6, 2017	August 14, 2017

Respectfully submitted,

/s/ Bruce R. Ewing

Bruce R. Ewing

cc: Counsel of Record (via ECF)